

January 5, 2004

TSTF-04-01

Dr. William D. Beckner, Director
Operating Reactor Improvements Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Submittal of TSTF-369, Revision 1, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report"

Dear Dr. Beckner:

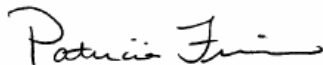
Enclosed is Revision 1 to TSTF-369. TSTF-369, Revision 1, eliminates the Technical Specification requirement for submittal of the Monthly Operating Report based on a commitment to submit the information to the NRC using an industry database. TSTF-369 also eliminates the Occupational Radiation Exposure Report. This report has been identified by the NRC as a candidate for removal in order to reduce unnecessary licensee administrative burdens. As both of these changes eliminate requirements from Standard Technical Specification Section 5.6, Reporting Requirements, and require renumbering remaining reports (including internal references to those reports throughout the Standard Technical Specifications) it is logical to combine the changes.

This Traveler was granted a fee waiver pursuant to the provisions of 10 CFR 170.11 as stated in your June 2, 2003 letter to A. R. Pietrangelo.

Should you have any questions, please do not hesitate to contact us.



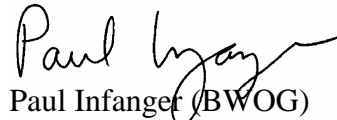
Dennis Buschbaum (WOG)



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Enclosure

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Technical Specification Task Force

Improved Standard Technical Specifications Change Traveler

Removal of Monthly Operating Report and Occupational Radiation Exposure ReportNUREGs Affected: ☒ 1430 ☒ 1431 ☒ 1432 ☒ 1433 ☒ 1434

Classification: 1) Technical Change

Recommended for CLIIP?: Yes

Correction or Improvement: Improvement

Industry Contact: Tom Silko, (802) 258-4146, tsilko@entergy.com

See attached.

Revision History

OG Revision 0**Revision Status: Active**

Revision Proposed by: Browns Ferry

Revision Description:
Original Issue**Owners Group Review Information**

Date Originated by OG: 19-Sep-00

Owners Group Comments:
(No Comments)

Owners Group Resolution: Approved Date: 30-Sep-00

TSTF Review Information

TSTF Received Date: 30-Sep-00

Date Distributed for Review: 07-Nov-00

OG Review Completed: ☒ BWOG ☒ WOG ☒ CEOG ☒ BWROGTSTF Comments:
(No Comments)

TSTF Resolution: Approved

Date: 07-Nov-00

NRC Review Information

NRC Received Date: 20-Nov-00

NRC Comments:

Date of NRC Letter: 29-Nov-01

11/29/2001 - TSTF-369 proposes eliminating the Monthly Operating Report. The staff still requires information provided in the Monthly Operating Report, and has proposed various modifications to the proposal. The NEI TSTF is considering the alternatives.

Final Resolution: Superseded by Revision

Final Resolution Date: 29-Nov-01

03-Jan-04

TSTF Revision 1**Revision Status: Active**

Revision Proposed by: TSTF

Revision Description:
Complete Replacement.

Removes the Monthly Operating Report and Occupational Radiation Exposure Report from the Technical Specifications.

Owners Group Review Information

Date Originated by OG: 04-Dec-03

Owners Group Comments:
(No Comments)

Owners Group Resolution: Approved Date: 04-Dec-03

TSTF Review Information

TSTF Received Date: 05-Dec-03 Date Distributed for Review: 21-Dec-03

OG Review Completed: ☒ BWOG ☒ WOG ☒ CEOG ☒ BWROG

TSTF Comments:
(No Comments)

TSTF Resolution: Approved Date: 29-Dec-03

NRC Review Information

NRC Received Date: 03-Jan-04

Affected Technical Specifications

1.1	Definitions	
	Change Description:	"CORE OPERATING LIMITS REPORT (COLR)"
1.1	Definitions	
	Change Description:	"PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)"
5.5.1	ODCM	
5.6.1	Occupational Radiation Exposure Report	
	Change Description:	Deleted
5.6.2	Annual Radiological Environmental Operating Report	
	Change Description:	Renumbered to 5.6.1

03-Jan-04

5.6.3	Radiological Effluent Release Report Change Description: Renumbered to 5.6.2	
5.6.4	Monthly Operating Reports Change Description: Deleted	
5.6.5	CORE OPERATING LIMITS REPORT (COLR) Change Description: Renumbered to 5.6.3	
5.6.6	Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR) Change Description: Renumbered to 5.6.4	
5.6.7	EDG Failures Report Change Description: Renumbered to 5.6.5	
5.6.8	PAM Report Change Description: Renumbered to 5.6.6	
5.6.9	Tendon Surveillance Report Change Description: Renumbered to 5.6.7	NUREG(s)- 1430 1431 1432 Only
5.6.10	Steam Generator Tube Inspection Report Change Description: Renumbered to 5.6.8	NUREG(s)- 1430 1431 1432 Only
Action 3.3.17.B	PAM Instrumentation	NUREG(s)- 1430 Only
Action 3.3.17.B Bases	PAM Instrumentation	NUREG(s)- 1430 Only
Action 3.3.17.G	PAM Instrumentation	NUREG(s)- 1430 Only
Action 3.3.17.G Bases	PAM Instrumentation	NUREG(s)- 1430 Only
Action 3.3.3.B	PAM Instrumentation	NUREG(s)- 1431 Only
Action 3.3.3.B Bases	PAM Instrumentation	NUREG(s)- 1431 Only
Action 3.3.3.G	PAM Instrumentation	NUREG(s)- 1431 Only
Action 3.3.3.G Bases	PAM Instrumentation	NUREG(s)- 1431 Only
Action 3.3.11.B	PAM Instrumentation (Analog)	NUREG(s)- 1432 Only
Action 3.3.11.B	PAM Instrumentation (Digital)	NUREG(s)- 1432 Only
Action 3.3.11.B Bases	PAM Instrumentation (Analog)	NUREG(s)- 1432 Only
Action 3.3.11.B Bases	PAM Instrumentation (Digital)	NUREG(s)- 1432 Only
Action 3.3.11.G	PAM Instrumentation (Analog)	NUREG(s)- 1432 Only
Action 3.3.11.G	PAM Instrumentation (Digital)	NUREG(s)- 1432 Only
Action 3.3.11.G Bases	PAM Instrumentation (Analog)	NUREG(s)- 1432 Only

03-Jan-04

Action	3.3.11.G Bases	PAM Instrumentation (Digital)	NUREG(s)- 1432 Only
Action	3.3.3.1.B	PAM Instrumentation	NUREG(s)- 1433 1434 Only
Action	3.3.3.1.B Bases	PAM Instrumentation	NUREG(s)- 1433 1434 Only
Action	3.3.3.1.G	PAM Instrumentation	NUREG(s)- 1433 1434 Only
Action	3.3.3.1.G Bases	PAM Instrumentation	NUREG(s)- 1433 1434 Only

03-Jan-04

1.0 Description

Standard Technical Specifications (STS) Section 5.6.4, Monthly Operating Reports (MOR), currently requires that a report of plant operating statistics and shutdown experience be submitted each month. This Traveler eliminates the Technical Specification requirement based on a commitment to report the information through the industry database.

STS 5.6.1, Occupational Radiation Exposure Report (ORER), requires an annual report be submitted of the number of station, utility, and other personnel for whom radiation exposure monitoring was performed according to work and job function. This TSTF eliminates this annual reporting requirement.

2.0 Proposed Change

STS 5.6.4, Monthly Operating Report, is deleted based on a Licensee commitment to report the same operating data using an industry database.

STS 5.6.1, Occupational Radiation Exposure Report, is deleted.

The remaining reporting requirements in Section 5.6 of the Standard Technical Specifications are renumbered. For plants adopting this change in plant-specific Technical Specifications, it is acceptable to mark these requirements “Deleted” and to not renumber the other reporting requirements in Section 5.6.

3.0 Background

MOR

Technical Specifications have historically included a requirement for the submittal of a MOR originally based on Draft Regulatory Guide 1.16, Revision 4, “Reporting of Operating Information - Appendix A Technical Specifications.” About one third of the nuclear plants use a reporting format based on this Regulatory Guide for their MOR submittals. Generic Letter (GL) 97-02, “Revised Contents of the Monthly Operating Report”, May 15, 1997, was subsequently issued and notified Licensees that the scope of the information required by the MOR TS could be reduced and provided a reporting template, which required reporting of several specific power generation statistics and a description of plant shutdown history for the month. The majority of plants currently use the GL 97-02 recommended scope and basic format in preparing MORs.

The industry estimates the cost associated with preparing these monthly submittals for the 104 nuclear plants is approximately 1 million dollars per year. The most recent (FY2000) Office of Management and Budget (OMB) clearance for 10 CFR Part 50 reporting requirements (No. 3150-0011) estimated that the net impact on the annualized cost to NRC attributed to reviewing and processing MORs was 9984 hours per year, which is approximately 1.4 million dollars per year using the FY 2000 NRC \$141/hour rate.

To reduce administrative burdens and costs of submitting MORs, the TSTF committee proposes an alternative approach to allow electronic reporting of MOR data via an industry database in lieu of the MOR letter report submittals currently being used. This alternate reporting process would provide burden reduction and associated cost savings without an adverse impact on reactor safety or plant operation, and is consistent with NRC initiatives and policy statements (References 1 and 2) on reducing administrative burdens for Licensees.

ORER

STS 5.6.1, ORER, requires an annual report be submitted tabulating the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in person - rem) according to work and job functions (e.g., reactor operations and surveillance, in-service inspection, routine maintenance, special maintenance, waste processing, and refueling). This tabulation supplements the reporting requirements of 10 CFR 20.2206.

The NRC staff has undertaken a Reducing Unnecessary Burden Initiative (RUBI). A workshop was held on May 21, 2001 at which the NRC performance goal to reduce unnecessary regulatory burden on stakeholders was discussed, which included a solicitation of suggestions from the industry of candidate reporting requirement reductions. In a letter (Reference 3) dated July 2, 2001, NEI provided NRC a consolidated industry list of potential burden reduction items. NRC subsequently documented its plans for the RUBI in SECY-02-0081, "Staff Activities Related to the NRC Goal of Reducing Unnecessary Regulatory Burden on Power Reactor Licensees," dated May 13, 2002 (Reference 1) and the Commission provided further direction on burden reduction initiatives to the NRC staff in a staff requirements memorandum dated June 25, 2002 (Reference 2).

In the course of the above interactions, the ORER was identified as a viable TS reporting requirement candidate for elimination and is currently being carried as an RUBI action as listed in the attachment to the letter from NRC to NEI, dated November 24, 2003 (Reference 4), which summarizes the current NEI License Amendment Task Force (LATF) and RUBI activities. Since the ORER reporting requirement is in TS, the TSTF committee was chartered to propose a generic change to the Standard TS to eliminate the requirement. The proposed reduction in reporting requirements provides an administrative burden reduction and associated cost savings without an adverse impact on reactor safety or plant operation.

4.0 Technical Analysis

MOR

The GL 97-02 MOR dataset includes the number of reactor critical hours for the equipment forced outage indicator, the forced outage hours and generator on-line hours for the forced outage rate indicator, the number of forced outages for the equipment forced outage indicator, and the outage type (whether forced or scheduled) for the forced outage rate. The GL 97-02

shutdown experience dataset includes a listing of reactor shutdowns in the previous month, information on method and reason for shutdown, and duration of outages.

Much of the MOR data is also reported to NRC or other federal agencies through other channels. For instance, power operating statistics are reported to the Energy Information Administration (EIA) via Forms EIA-759, EIA-423, EIA-826, and EIA-861, and others. Reporting of unplanned automatic reactor shutdowns and unplanned large reductions in power is required by the NRC Reactor Oversight Program (ROP) Performance Indicators. Additionally 10 CFR 50.73 requires that detailed Licensee Event Reports be submitted for plant shutdowns resulting from unplanned reactor automatic and manual scrams, and for completion of plant shutdowns required by TS.

The MORs do, however, provide a compilation of the operating statistics and shutdown experience that can be used for a convenient reference of plant operating information and for general trending of power operating performance. In keeping with the nature of the information, data from the MORs is used by NRC to keep abreast of overall nuclear plant power generation statistics. For instance, NRC publishes yearly trend graphs of Forced Outage Rate and Equipment Forced Outages, which is extracted from the MOR datasets.

At present, all Licensees provide a letter report submittal to NRC each month which includes the MOR data. As noted previously, the majority of plants use the GL 97-02 recommended dataset. To take advantage of efficiencies afforded by electronic reporting and use of standardized reporting templates, the industry has been involved in the establishment of a shared database, which compiles the MOR data as an electronic GL 97-02 dataset. NRC has been kept apprised of this effort through periodic meeting with the LATF. The reporting database has been pilot tested and is now available for utilities to use. The protocol for electronic MOR reporting using this industry database is a combined (all nuclear plants) quarterly electronic submittal of monthly operating and shutdown history data (same data required by GL 97-02). The proposed quarterly reporting frequency was chosen for consistency with the current reporting frequency of the NRC ROP performance indicators. To support the industry effort, this TSTF proposes a change to STS that would delete the STS submittal requirement based on an individual Licensee's commitment to report MOR data via the combined industry database.

Electronic reporting of operating data provides NRC with the same MOR dataset prescribed by GL 97-02, yet relieves Licensees of the administrative burdens of preparing monthly letter-based report submittals. Efficiencies should also be realized by NRC in that use of a standard database for submittal of operating statistics will facilitate NRC's ability to compile and permute the data. Hence, this proposed alternative reporting process would provide administrative burden reduction for Licensees, without an adverse impact on reactor safety or plant operation.

ORER

10 CFR 20 provides the personnel radiation exposure reporting requirements for nuclear power plants and other licensees. 10 CFR 20.2206(c) specifically requires that each licensee file a report of radiation exposures and radioactive material intake for monitored personnel

no later than April 30 of each year, covering the previous year. NRC Form 5 or electronic media including the equivalent of NRC Form 5 is used for this purpose.

The information provided by the 10 CFR 20.2206 reporting requirement is used by NRC to evaluate trends regarding effectiveness of overall NRC and licensee radiation protection programs, and for comparative analyses of radiation protection performance among nuclear facilities. The data is also used as one of the metrics in NRC's Reactor Oversight Program and for inspection planning purposes, and for various other NRC applications. The data reported under 10 CFR 20.2206 is compiled by NRC and presented in the series of NUREG-071 3 reports, "Occupational Radiation Exposure at Commercial Nuclear Power Plants", which are published annually.

STS 5.6.1 requires an additional annual report be submitted tabulating the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, who received an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent, compiled according to work and job functions (e.g., reactor operations and surveillance, in-service inspection, routine maintenance, special maintenance, waste processing, and refueling). The ORER supplements the reporting requirements of 10 CFR 20.2206; however, it is not required by 10 CFR 20.2206.

ORER data was also previously presented in NUREG-0713, through Volume 19 (report for calendar year 1997). In Volume 20 of NUREG-0713 (report for calendar year 1998), NRC announced that the ORER dose data by work function and employee type would no longer be published in the NUREG. Based on this, it is appropriate that Licensees should not be required to continue to submit the ORER data to NRC. The proposed reduction in reporting requirements provides an administrative burden reduction and associated cost savings without creating an adverse impact on plant or radiation protection safety.

5.0 Regulatory Analysis

5.1 No Significant Hazards Consideration

The TSTF has evaluated whether or not a significant hazards consideration is involved with the proposed generic change by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change eliminates the Technical Specifications reporting requirement to provide a monthly operating letter report of shutdown experience and operating statistics if the equivalent data is submitted using an industry electronic database. It also eliminates the Technical Specification reporting requirement for occupational radiation exposure information which is excess that required to be submitted by

regulations. The proposed change involves no changes to plant systems or accident analyses. As such, the change is administrative in nature and does not affect initiators of analyzed events or assumed mitigation of accidents or transients. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change does not involve a physical alteration of the plant, add any new equipment, or require any existing equipment to be operated in a manner different from the present design. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No

This change is administrative change to reporting requirements of plant operating information and occupational radiation exposure data, and will not reduce a margin of safety because it has no effect on any safety analyses assumptions. Hence, this change is administrative in nature. For these reasons, the proposed change does not involve a significant reduction in the margin of safety.

Based on the above, the TSTF concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of “no significant hazards consideration” is justified.

5.2 Applicable Regulatory Requirements/Criteria

A number of NRC reporting requirements are specified in Title 10 of the Code of Federal Regulations (CFR), which provide prescriptive criteria for reporting events and information. An example of this is 10 CFR 50.73, which requires that Licensees provide reports for specified plant events and conditions. There are no 10 CFR regulations that directly require the submittal of the MOR, which rather is specified by individual plant Technical Specifications. Since MOR data is of a general informational nature, and is not required by statute or used to support licensing applications, the means and frequency of submittal of the MOR data to NRC is not restricted by 10 CFR. Accordingly, this proposed change does not alter or change any existing reporting obligations required by 10 CFR and maintains consistency with required applicable regulatory requirements.

10 CFR 20 provides the base radiation personnel exposure reporting requirements for nuclear power plants. 10 CFR 20.2206(c) requires that each licensee file a report of radiation exposures and radioactive material intake for monitored personnel for the previous year. There are no 10 CFR regulations that require the submittal of the ORE data, which rather is

specified by individual plant Technical Specifications. The ORER data is of a general informational nature, and is not required by statute or used to support licensing applications. Accordingly, this proposed change does not alter or change any existing reporting obligations required by the Code of Federal Regulations and maintains consistency with required applicable regulatory requirements.

Based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the approval of the proposed change will not be inimical to the common defense and security or to the health and safety of the public.

6.0 Environmental Consideration

The proposed amendment is confined to (i) changes to surety, insurance, and/or indemnity requirements, or (ii) changes to recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

7.0 References

1. SECY-02-0081, May 13, 2002, NRC Letter from W. D. Travers to NRC Commissioners - Staff Activities Related to the NRC Goal of Reducing Unnecessary Regulatory Burden on Power Reactor Licensees
2. SECY-02-0081, June 25, 2002, NRC Letter from A. L. Vietti-Cook to W. D. Travers - Staff Activities Related to the NRC Goal of Reducing Unnecessary Regulatory Burden on Power Reactor Licensees
3. Letter dated July 2, 2001, from NEI to NRC, Workshop on Reducing Unnecessary Regulatory Burden
4. November 24, 2003, NRC Letter from Eric J. Leeds to James W. Davis - Licensing Action Task Force and the Reducing Unnecessary Burden Initiative

1.1 Definitions

CHANNEL CHECK (continued)

the channel indication and status to other indications or status derived from independent instrument channels measuring the same parameter.

CHANNEL FUNCTIONAL TEST A CHANNEL FUNCTIONAL TEST shall be the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY of all devices in the channel required for channel OPERABILITY.

The ESFAS CHANNEL FUNCTIONAL TEST shall also include testing of ESFAS safety related bypass functions for each channel affected by bypass operation. The CHANNEL FUNCTIONAL TEST may be performed by means of any series of sequential, overlapping, or total steps.

CONTROL RODS CONTROL RODS shall be all full length safety and regulating rods that are used to shut down the reactor and control power level during maneuvering operations.

CORE ALTERATION CORE ALTERATION shall be the movement of any fuel, sources, or reactivity control components, within the reactor vessel with the vessel head removed and fuel in the vessel. Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.

CORE OPERATING LIMITS REPORT (COLR) The COLR is the unit specific document that provides cycle specific parameter limits for the current reload cycle. These cycle specific limits shall be determined for each reload cycle in accordance with Specification 5.6.1. Plant operation within these limits is addressed in individual **3**ifications.

DOSE EQUIVALENT I-131 DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcuries/gram) that alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be those listed in [Table III of TID-14844, AEC, 1962, "Calculation of Distance Factors for Power and Test Reactor Sites," or those listed in Table E-7 of Regulatory Guide 1.109, Rev. 1, NRC, 1977, or ICRP 30, Supplement to Part 1, page 192-212, table titled, "Committed Dose

1.1 Definitions

OPERABLE - OPERABILITY (continued)

perform its specified safety function(s) are also capable of performing their related support function(s).

PHYSICS TESTS

PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation.

These tests are:

- a. Described in Chapter [14, Initial Test Program] of the FSAR,
- b. Authorized under the provisions of 10 CFR 50.59, or
- c. Otherwise approved by the Nuclear Regulatory Commission.

PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)

The PTLR is the unit specific document that provides the reactor vessel pressure and temperature limits, including heatup and cooldown rates, for the current reactor vessel fluence period. These pressure and temperature limits shall be determined for each fluence period in accordance with Specification 5.6. ~~6~~. **4**

QUADRANT POWER TILT (QPT)

QPT shall be defined by the following equation and is expressed as a percentage of the Power in any Core Quadrant (P_{quad}) to the Average Power of all Quadrants (P_{avg}).

$$QPT = 100 [(P_{quad} / P_{avg}) - 1]$$

RATED THERMAL POWER (RTP)

RTP shall be a total reactor core heat transfer rate to the reactor coolant of [2544] MWt.

REACTOR PROTECTION SYSTEM (RPS) RESPONSE TIME

The RPS RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its RPS trip setpoint at the channel sensor until electrical power is interrupted at the control rod drive trip breakers. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.

3.3 INSTRUMENTATION

3.3.17 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.17 The PAM instrumentation for each Function in Table 3.3.17-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

- NOTES -

1. LCO 3.0.4 is not applicable.
2. Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one required channel inoperable.	A.1 Restore required channel to OPERABLE status.	30 days
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action in accordance with Specification 5.6.7. 5	Immediately
C. ----- - NOTE - Not applicable to hydrogen monitor channels. ----- One or more Functions with two required channels inoperable.	C.1 Restore one channel to OPERABLE status.	7 days
D. Two required hydrogen monitor channels inoperable.	D.1 Restore one required hydrogen monitor channel to OPERABLE status.	72 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Required Action and associated Completion Time of Condition C or D not met.	E.1 Enter the Condition referenced in Table 3.3.17-1 for the channel.	Immediately
F. As required by Required Action E.1 and referenced in Table 3.3.17-1.	F.1 Be in MODE 3. <u>AND</u> F.2 Be in MODE 4.	6 hours 12 hours
G. As required by Required Action E.1 and referenced in Table 3.3.17-1.	G.1 Initiate action in accordance with Specification 5.6.7. 5	Immediately

SURVEILLANCE REQUIREMENTS

- NOTE -

These SRs apply to each PAM instrumentation Function in Table 3.3.17-1.

SURVEILLANCE	FREQUENCY
SR 3.3.17.1 Perform CHANNEL CHECK for each required instrumentation channel that is normally energized.	31 days
SR 3.3.17.2 ----- - NOTE - Neutron detectors are excluded from CHANNEL CALIBRATION. ----- Perform CHANNEL CALIBRATION.	[18] months

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs shall be established, implemented, and maintained.

5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program, and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release Reports required by Specification [5.6.1] and Specification [5.6.2].

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 - 1. Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s) and
 - 2. A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations,
- b. Shall become effective after the approval of the plant manager, and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Occupational Radiation Exposure Report

- NOTE -

[A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.]

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in person - rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance [describe maintenance], waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescence dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totaling < 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year. [The initial report shall be submitted by April 30 of the year following the initial criticality.]

5.6.2 Annual Radiological Environmental Operating Report

- NOTE -

[A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.]

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all

5.6 Reporting Requirements

5.6.1 **1** Annual Radiological Environmental Operating Report (continued)

environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements [in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979]. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 **2** Radiological Effluent Release Report

- NOTE -

[A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.]

The Radioactive Effluent Release Report covering the operation of the unit in the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

5.6.5 **3** CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

[The individual specifications that address core operating limits must be referenced here.]

5.6 Reporting Requirements

5.6.6 **3** CORE OPERATING LIMITS REPORT (continued)

- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

[Identify the Topical Report(s) by number and title or identify the staff Safety Evaluation Report for a plant specific methodology by NRC letter and date. The COLR will contain the complete identification for each of the TS referenced topical reports used to prepare the COLR (i.e., report number, title, revision, date, and any supplements).]
- c. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling System (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met.
- d. The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

5.6.6 **4** Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)

- a. RCS pressure and temperature limits for heat up, cooldown, low temperature operation, criticality, and hydrostatic testing as well as heatup and cooldown rates shall be established and documented in the PTLR for the following:

[The individual specifications that address RCS pressure and temperature limits must be referenced here.]
- b. The analytical methods used to determine the RCS pressure and temperature limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

[Identify the NRC staff approval document by date.]
- c. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.

5.6 Reporting Requirements

5.6.6 **4** RCS PRESSURE AND TEMPERATURE LIMITS REPORT (continued)

- REVIEWER'S NOTE -

The methodology for the calculation of the P-T limits for NRC approval should include the following provisions:

1. The methodology shall describe how the neutron fluence is calculated (reference new Regulatory Guide when issued).
 2. The Reactor Vessel Material Surveillance Program shall comply with Appendix H to 10 CFR 50. The reactor vessel material irradiation surveillance specimen removal schedule shall be provided, along with how the specimen examinations shall be used to update the PTLR curves.
 3. Low Temperature Overpressure Protection (LTOP) System lift setting limits for the Power Operated Relief Valves (PORVs), developed using NRC-approved methodologies may be included in the PTLR.
 4. The adjusted reference temperature (ART) for each reactor beltline material shall be calculated, accounting for radiation embrittlement, in accordance with Regulatory Guide 1.99, Revision 2.
 5. The limiting ART shall be incorporated into the calculation of the pressure and temperature limit curves in accordance with NUREG-0800 Standard Review Plan 5.3.2, Pressure-Temperature Limits.
 6. The minimum temperature requirements of Appendix G to 10 CFR Part 50 shall be incorporated into the pressure and temperature limit curves.
 7. Licensees who have removed two or more capsules should compare for each surveillance material the measured increase in reference temperature (RT_{NDT}) to the predicted increase in RT_{NDT} ; where the predicted increase in RT_{NDT} is based on the mean shift in RT_{NDT} plus the two standard deviation value ($2\sigma_{\Delta}$) specified in Regulatory Guide 1.99, Revision 2. If the measured value exceeds the predicted value (increase in $RT_{NDT} + 2\sigma_{\Delta}$), the licensee should provide a supplement to the PTLR to demonstrate how the results affect the approved methodology.
-

5.6.7 **5** Post Accident Monitoring Report

When a report is required by Condition B or G of LCO 3.3.[17], "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of

5.6 Reporting Requirements

5.6. **5** Post Accident Monitoring Report (continued)

monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

5.6. **6** [Tendon Surveillance Report

Any abnormal degradation of the containment structure detected during the tests required by the Pre-stressed Concrete Containment Tendon Surveillance Program shall be reported to the NRC within 30 days. The report shall include a description of the tendon condition, the condition of the concrete (especially at tendon anchorages), the inspection procedures, the tolerances on cracking, and the corrective action taken.]

5.6. **7** Steam Generator Tube Inspection Report

- REVIEWER'S NOTES -

1. Reports required by the Licensee's current licensing basis regarding steam generator tube surveillance requirements shall be included here. An appropriate administrative controls format should be used.
 2. These reports may be required covering inspection, test, and maintenance activities. These reports are determined on an individual basis for each unit and their preparation and submittal are designated in the Technical Specifications.
-
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BASES

ACTIONS (continued)

B.1

5

Required Action B.1 specifies initiation of action described in Specification 5.6.7, that requires a written report to be submitted to the NRC. This report discusses the results of the root cause evaluation of the inoperability and identifies proposed restorative actions. This action is appropriate in lieu of a shutdown requirement since alternative actions are identified before loss of functional capability and given the likelihood of unit conditions that would require information provided by this instrumentation. The Completion Time of "Immediately" for Required Action B.1 ensures the requirements of Specification 5.6.7 are initiated.

5

C.1

When one or more Functions have two required channels inoperable (i.e., two channels inoperable in the same Function), one channel in the Function should be restored to OPERABLE status within 7 days. This Condition does not apply to the hydrogen monitor channels. The Completion Time of 7 days is based on the relatively low probability of an event requiring PAM instrumentation action operation and the availability of alternative means to obtain the required information. Continuous operation with two required channels inoperable in a Function is not acceptable because the alternate indications may not fully meet all performance of qualification requirements applied to the PAM instrumentation. Therefore, requiring restoration of one inoperable channel of the Function limits the risk that the PAM Function will be in a degraded condition should an accident occur.

D.1

When two required hydrogen monitor channels are inoperable, Required Action D.1 requires one channel to be restored to OPERABLE status. This action restores the monitoring capability of the hydrogen monitor. The 72 hour Completion Time is based on the relatively low probability of an event requiring hydrogen monitoring and the availability of alternative means to obtain the required information. Continuous operation with two required channels inoperable is not acceptable because alternate indications are not available.

E.1

Required Action E.1 directs entry into the appropriate Condition referenced in Table 3.3.17-1. The applicable Condition referenced in the

BASES

ACTIONS (continued)

Table is Function dependent. Each time an inoperable channel has not met any Required Action of Condition C or D, as applicable, and the associated Completion Time has expired, Condition E is entered for that channel and provides for transfer to the appropriate subsequent Condition.

F.1

If the Required Action and associated Completion Time of Conditions C or D are not met and Table 3.3.17-1 directs entry into Condition F, the unit must be brought to a MODE in which the requirements of this LCO do not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and MODE 4 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

G.1

At this unit, alternative means of monitoring Containment Area Radiation have been developed and tested. These alternative means may be temporarily installed if the normal PAM channel cannot be restored to OPERABLE status within the allowed time.

If these alternative means are used, the Required Action is not to shut the unit down, but rather to follow the directions of Specification 5.6.1, in the Administrative Controls section of the Technical Specifications. The report provided to the NRC should discuss the alternative means used, describe the degree to which the alternative means are equivalent to the installed PAM channels, justify the areas in which they are not equivalent, and provide a schedule for restoring the normal PAM channels. **5**

In the case of reactor vessel level, Reference 4 determined that the appropriate Required Action was not to shut the unit down, but rather to follow the directions of Specification 5.6.1. **5**

[At this unit, the alternative monitoring provisions consist of the following:]

1.1 Definitions

CHANNEL OPERATIONAL TEST (COT)	A COT shall be the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY of all devices in the channel required for channel OPERABILITY. The COT shall include adjustments, as necessary, of the required alarm, interlock, and trip setpoints required for channel OPERABILITY such that the setpoints are within the necessary range and accuracy. The COT may be performed by means of any series of sequential, overlapping, or total channel steps.
CORE ALTERATION	CORE ALTERATION shall be the movement of any fuel, sources, or reactivity control components, within the reactor vessel with the vessel head removed and fuel in the vessel. Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.
CORE OPERATING LIMITS REPORT (COLR)	The COLR is the unit specific document that provides cycle specific parameter limits for the current reload cycle. These cycle specific parameter limits shall be determined for each reload cycle in accordance with Specification 5.6.6. Plant operation within these limits is addressed in individual 3 Specifications.
DOSE EQUIVALENT I-131	DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcuries/gram) that alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be those listed in [Table III of TID-14844, AEC, 1962, "Calculation of Distance Factors for Power and Test Reactor Sites," or those listed in Table E-7 of Regulatory Guide 1.109, Rev. 1, NRC, 1977, or ICRP 30, Supplement to Part 1, page 192-212, Table titled, "Committed Dose Equivalent in Target Organs or Tissues per Intake of Unit Activity"].
\bar{E} - AVERAGE DISINTEGRATION ENERGY	\bar{E} shall be the average (weighted in proportion to the concentration of each radionuclide in the reactor coolant at the time of sampling) of the sum of the average beta and gamma energies per disintegration (in MeV) for isotopes, other than iodines, with half lives > [15] minutes, making up at least 95% of the total noniodine activity in the coolant.

1.1 Definitions

MASTER RELAY TEST	A MASTER RELAY TEST shall consist of energizing each required master relays in the channel required for channel OPERABILITY and verifying the OPERABILITY of each required master relay. The MASTER RELAY TEST shall include a continuity check of each associated required slave relay. The MASTER RELAY TEST may be performed by means of any series of sequential, overlapping, or total steps.
MODE	A MODE shall correspond to any one inclusive combination of core reactivity condition, power level, average reactor coolant temperature, and reactor vessel head closure bolt tensioning specified in Table 1.1-1 with fuel in the reactor vessel.
OPERABLE - OPERABILITY	A system, subsystem, train, component, or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, normal or emergency electrical power, cooling and seal water, lubrication, and other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its specified safety function(s) are also capable of performing their related support function(s).
PHYSICS TESTS	PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation. These tests are: <ul style="list-style-type: none"> a. Described in Chapter [14, Initial Test Program] of the FSAR, b. Authorized under the provisions of 10 CFR 50.59, or c. Otherwise approved by the Nuclear Regulatory Commission.
PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)	The PTLR is the unit specific document that provides the reactor vessel pressure and temperature limits, including heatup and cooldown rates and the LTOP arming temperature, for the current reactor vessel fluence period. These pressure and temperature limits shall be determined for each fluence period in accordance with Specification 5.6.6. 4

3.3 INSTRUMENTATION

3.3.3 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.3 The PAM instrumentation for each Function in Table 3.3.3-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

- NOTES -

1. LCO 3.0.4 is not applicable.
2. Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one required channel inoperable.	A.1 Restore required channel to OPERABLE status.	30 days
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action in accordance with Specification 5.6. 7 . 5	Immediately
C. ----- - NOTE - Not applicable to hydrogen monitor channels. ----- One or more Functions with two required channels inoperable.	C.1 Restore one channel to OPERABLE status.	7 days
D. Two hydrogen monitor channels inoperable.	D.1 Restore one hydrogen monitor channel to OPERABLE status.	72 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Required Action and associated Completion Time of Condition C or D not met.	E.1 Enter the Condition referenced in Table 3.3.3-1 for the channel.	Immediately
F. As required by Required Action E.1 and referenced in Table 3.3.3-1.	F.1 Be in MODE 3. <u>AND</u> F.2 Be in MODE 4.	6 hours 12 hours
G. As required by Required Action E.1 and referenced in Table 3.3.3-1.	G.1 Initiate action in accordance with Specification 5.6.7. 5	Immediately

SURVEILLANCE REQUIREMENTS

- NOTE -

SR 3.3.3.1 and SR 3.3.3.2 apply to each PAM instrumentation Function in Table 3.3.3-1.

SURVEILLANCE	FREQUENCY
SR 3.3.3.1 Perform CHANNEL CHECK for each required instrumentation channel that is normally energized.	31 days
SR 3.3.3.2 ----- - NOTE - Neutron detectors are excluded from CHANNEL CALIBRATION. ----- Perform CHANNEL CALIBRATION.	[18] months

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs shall be established, implemented, and maintained.

5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program, and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release Reports required by Specification [5.6.2] and Specification [5.6.1].

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 1. Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s) and
 2. A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations,
- b. Shall become effective after the approval of the plant manager, and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Occupational Radiation Exposure Report

- REVIEWER'S NOTE -

[A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.]

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in person-rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance [describe maintenance], waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescence dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totaling < 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year. [The initial report shall be submitted by April 30 of the year following the initial criticality.]

5.6.2 **1** Annual Radiological Environmental Operating Report

- REVIEWER'S NOTE -

[A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.]

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all

5.6 Reporting Requirements

5.6.2 **1** Annual Radiological Environmental Operating Report (continued)

environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements [in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979]. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 **2** Radioactive Effluent Release Report

- REVIEWER'S NOTE -

[A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.]

The Radioactive Effluent Release Report covering the operation of the unit in the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

5.6.5 **3** CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

[The individual specifications that address core operating limits must be referenced here.]

5.6 Reporting Requirements

5.6.3 CORE OPERATING LIMITS REPORT (continued)

- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

[Identify the Topical Report(s) by number and title or identify the staff Safety Evaluation Report for a plant specific methodology by NRC letter and date. The COLR will contain the complete identification for each of the TS referenced topical reports used to prepare the COLR (i.e., report number, title, revision, date, and any supplements).]
- c. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met.
- d. The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

5.6.4 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)

- a. RCS pressure and temperature limits for heat up, cooldown, low temperature operation, criticality, and hydrostatic testing, LTOP arming, and PORV lift settings as well as heatup and cooldown rates shall be established and documented in the PTLR for the following:

[The individual specifications that address RCS pressure and temperature limits must be referenced here.]
- b. The analytical methods used to determine the RCS pressure and temperature limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

[Identify the Topical Report(s) by number and title or identify the NRC Safety Evaluation for a plant specific methodology by NRC letter and date. The PTLR will contain the complete identification for each of the TS referenced Topical Reports used to prepare the PTLR (i.e., report number, title, revision, date, and any supplements).]
- c. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.

5.6 Reporting Requirements

5.6.6 **4** RCS PRESSURE AND TEMPERATURE LIMITS REPORT (continued)

- REVIEWER'S NOTE -

The methodology for the calculation of the P-T limits for NRC approval should include the following provisions:

1. The methodology shall describe how the neutron fluence is calculated (reference new Regulatory Guide when issued).
 2. The Reactor Vessel Material Surveillance Program shall comply with Appendix H to 10 CFR 50. The reactor vessel material irradiation surveillance specimen removal schedule shall be provided, along with how the specimen examinations shall be used to update the PTLR curves.
 3. Low Temperature Overpressure Protection (LTOP) System lift setting limits for the Power Operated Relief Valves (PORVs), developed using NRC-approved methodologies may be included in the PTLR.
 4. The adjusted reference temperature (ART) for each reactor beltline material shall be calculated, accounting for radiation embrittlement, in accordance with Regulatory Guide 1.99, Revision 2.
 5. The limiting ART shall be incorporated into the calculation of the pressure and temperature limit curves in accordance with NUREG-0800 Standard Review Plan 5.3.2, Pressure-Temperature Limits.
 6. LTOP arming temperature limit development methodology.
 7. The minimum temperature requirements of Appendix G to 10 CFR Part 50 shall be incorporated into the pressure and temperature limit curves.
 8. Licensees who have removed two or more capsules should compare for each surveillance material the measured increase in reference temperature (RT_{NDT}) to the predicted increase in RT_{NDT} ; where the predicted increase in RT_{NDT} is based on the mean shift in RT_{NDT} plus the two standard deviation value ($2\sigma_{\Delta}$) specified in Regulatory Guide 1.99, Revision 2. If the measured value exceeds the predicted value (increase $RT_{NDT} + 2\sigma_{\Delta}$), the licensee should provide a supplement to the PTLR to demonstrate how the results affect the approved methodology.
-

5.6 Reporting Requirements

5.6.7 **5** Post Accident Monitoring Report

When a report is required by Condition B or G of LCO 3.3.[3], "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

5.6.8 **6** Tendon Surveillance Report

Any abnormal degradation of the containment structure detected during the tests required by the Pre-stressed Concrete Containment Tendon Surveillance Program shall be reported to the NRC within 30 days. The report shall include a description of the tendon condition, the condition of the concrete (especially at tendon anchorages), the inspection procedures, the tolerances on cracking, and the corrective action taken.]

5.6.9 **7** Steam Generator Tube Inspection Report

- REVIEWER'S NOTES -

1. Reports required by the Licensee's current licensing basis regarding steam generator tube surveillance requirements shall be included here. An appropriate administrative controls format should be used.
 2. These reports may be required covering inspection, test, and maintenance activities. These reports are determined on an individual basis for each unit and their preparation and submittal are designated in the Technical Specifications.
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REVISION HISTORY

REVISION	TSTF	DESCRIPTION	APPROVED
2.1	TSTF-419	Revise PTLR Definition and References in ISTS 5.6.6, RCS PTLR	03/21/02

BASES

ACTIONS (continued)

Note 2 has been added in the ACTIONS to clarify the application of Completion Time rules. The Conditions of this Specification may be entered independently for each Function listed on Table 3.3.3-1. The Completion Time(s) of the inoperable channel(s) of a Function will be tracked separately for each Function starting from the time the Condition was entered for that Function.

A.1

Condition A applies when one or more Functions have one required channel that is inoperable. Required Action A.1 requires restoring the inoperable channel to OPERABLE status within 30 days. The 30 day Completion Time is based on operating experience and takes into account the remaining OPERABLE channel (or in the case of a Function that has only one required channel, other non-Regulatory Guide 1.97 instrument channels to monitor the Function), the passive nature of the instrument (no critical automatic action is assumed to occur from these instruments), and the low probability of an event requiring PAM instrumentation during this interval.

B.1

5

Condition B applies when the Required Action and associated Completion Time for Condition A are not met. This Required Action specifies initiation of actions in Specification 5.6.7, which requires a written report to be submitted to the NRC immediately. This report discusses the results of the root cause evaluation of the inoperability and identifies proposed restorative actions. This action is appropriate in lieu of a shutdown requirement since alternative actions are identified before loss of functional capability, and given the likelihood of unit conditions that would require information provided by this instrumentation.

C.1

Condition C applies when one or more Functions have two inoperable required channels (i.e., two channels inoperable in the same Function). Required Action C.1 requires restoring one channel in the Function(s) to OPERABLE status within 7 days. The Completion Time of 7 days is based on the relatively low probability of an event requiring PAM instrument operation and the availability of alternate means to obtain the required information. Continuous operation with two required channels inoperable in a Function is not acceptable because the alternate indications may not fully meet all performance qualification requirements

BASES

ACTIONS (continued)

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

G.1

At this unit, alternate means of monitoring Reactor Vessel Water Level and Containment Area Radiation have been developed and tested. These alternate means may be temporarily installed if the normal PAM channel cannot be restored to OPERABLE status within the allotted time. If these alternate means are used, the Required Action is not to shut 5 down the unit but rather to follow the directions of Specification 5.6.7, in the Administrative Controls section of the TS. The report provided to the NRC should discuss the alternate means used, describe the degree to which the alternate means are equivalent to the installed PAM channels, justify the areas in which they are not equivalent, and provide a schedule for restoring the normal PAM channels.

SURVEILLANCE REQUIREMENTS

A Note has been added to the SR Table to clarify that SR 3.3.3.1 and SR 3.3.3.3 apply to each PAM instrumentation Function in Table 3.3.3-1.

SR 3.3.3.1

Performance of the CHANNEL CHECK once every 31 days ensures that a gross instrumentation failure has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the two instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION. The high radiation instrumentation should be compared to similar unit instruments located throughout the unit.

Agreement criteria are determined by the unit staff, based on a combination of the channel instrument uncertainties, including isolation, indication, and readability. If a channel is outside the criteria, it may be an indication that the sensor or the signal processing equipment has drifted outside its limit. If the channels are within the criteria, it is an indication that the channels are OPERABLE.

1.1 Definitions

CHANNEL CALIBRATION (continued)

CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps.

CHANNEL CHECK

A CHANNEL CHECK shall be the qualitative assessment, by observation, of channel behavior during operation. This determination shall include, where possible, comparison of the channel indication and status to other indications or status derived from independent instrument channels measuring the same parameter.

CHANNEL FUNCTIONAL TEST A CHANNEL FUNCTIONAL TEST shall be:

- a. Analog and bistable channels - the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY of all devices in the channel required for channel OPERABILITY, and
- b. Digital computer channels - the use of diagnostic programs to test digital computer hardware and the injection of simulated process data into the channel to verify OPERABILITY of all devices in the channel required for channel OPERABILITY.

The CHANNEL FUNCTIONAL TEST may be performed by means of any series of sequential, overlapping, or total channel steps so that the entire channel is tested.

CORE ALTERATION

CORE ALTERATION shall be the movement of any fuel, sources, or reactivity control components [excluding control element assemblies (CEAs) withdrawn into the upper guide structure], within the reactor vessel with the vessel head removed and fuel in the vessel. Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.

CORE OPERATING LIMITS REPORT (COLR)

The COLR is the unit specific document that provides cycle specific parameter limits for the current reload cycle. These cycle specific parameter limits shall be determined for each reload cycle in accordance with Specification 5.6. Plant operation within these limits is addressed in individual **3** Specifications.

1.1 Definitions

PHYSICS TESTS (continued)

- a. Described in Chapter [14, Initial Test Program] of the FSAR,
- b. Authorized under the provisions of 10 CFR 50.59, or
- c. Otherwise approved by the Nuclear Regulatory Commission.

PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)

4

The PTLR is the unit specific document that provides the reactor vessel pressure and temperature limits, including heatup and cooldown rates, for the current reactor vessel fluence period. These pressure and temperature limits shall be determined for each fluence period in accordance with Specification 5.6.6. Plant operation within these operating limits is addressed in LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits," and LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP) System."

RATED THERMAL POWER (RTP)

RTP shall be a total reactor core heat transfer rate to the reactor coolant of [3410] MWt.

REACTOR PROTECTION SYSTEM (RPS) RESPONSE TIME

The RPS RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its RPS trip setpoint at the channel sensor until electrical power to the CEAs drive mechanism is interrupted. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured. In lieu of measurement, response time may be verified for selected components provided that the components and methodology for verification have been previously reviewed and approved by the NRC.

SHUTDOWN MARGIN (SDM)

SDM shall be the instantaneous amount of reactivity by which the reactor is subcritical or would be subcritical from its present condition assuming:

- a. All full length CEAs (shutdown and regulating) are fully inserted except for the single CEA of highest reactivity worth, which is assumed to be fully withdrawn. However, with all CEAs verified fully inserted by two independent means, it is not necessary to account for a stuck CEA in the SDM calculation. With any CEAs not capable of being fully inserted, the reactivity worth of

3.3 INSTRUMENTATION

3.3.11 Post Accident Monitoring (PAM) Instrumentation (Analog)

LCO 3.3.11 The PAM instrumentation for each Function in Table 3.3.11-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

- NOTES -

1. LCO 3.0.4 is not applicable.
2. Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one required channel inoperable.	A.1 Restore required channel to OPERABLE status.	30 days
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action in accordance with Specification 5.6.7. 5	Immediately
C. ----- - NOTE - Not applicable to hydrogen monitor channels. ----- One or more Functions with two required channels inoperable.	C.1 Restore one channel to OPERABLE status.	7 days
D. Two hydrogen monitor channels inoperable.	D.1 Restore one hydrogen monitor channel to OPERABLE status.	72 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Required Action and associated Completion Time of Condition C or D not met.	E.1 Enter the Condition referenced in Table 3.3.11-1 for the channel.	Immediately
F. As required by Required Action E.1 and referenced in Table 3.3.11-1.	F.1 Be in MODE 3.	6 hours
	<u>AND</u> F.2 Be in MODE 4.	12 hours
G. [As required by Required Action E.1 and referenced in Table 3.3.11-1.	G.1 Initiate action in accordance with Specification 5.6.7. 5	Immediately]

SURVEILLANCE REQUIREMENTS

- NOTE -

These SRs apply to each PAM instrumentation Function in Table 3.3.11-1.

SURVEILLANCE		FREQUENCY
SR 3.3.11.1	Perform CHANNEL CHECK for each required instrumentation channel that is normally energized.	31 days
SR 3.3.11.2	<p>-----</p> <p>- NOTE -</p> <p>Neutron detectors are excluded from CHANNEL CALIBRATION.</p> <p>-----</p> <p>Perform CHANNEL CALIBRATION.</p>	[18] months

3.3 INSTRUMENTATION

3.3.11 Post Accident Monitoring (PAM) Instrumentation (Digital)

LCO 3.3.11 The PAM instrumentation for each Function in Table 3.3.11-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.
During movement of [recently] irradiated fuel assemblies.

ACTIONS

- NOTES -

1. LCO 3.0.4 not applicable.
2. Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one required channel inoperable.	A.1 Restore required channel to OPERABLE status.	30 days
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action in accordance with Specification 5.6.7. 5	Immediately
C. ----- - NOTE - Not applicable to hydrogen monitor channels. ----- One or more Functions with two required channels inoperable.	C.1 Restore one channel to OPERABLE status.	7 days
D. Two hydrogen monitor channels inoperable.	D.1 Restore one hydrogen monitor channel to OPERABLE status.	72 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Required Action and associated Completion Time of Condition C or D not met.	E.1 Enter the Condition referenced in Table 3.3.11-1 for the channel.	Immediately
F. As required by Required Action E.1 and referenced in Table 3.3.11-1.	F.1 Be in MODE 3.	6 hours
	<u>AND</u> F.2 Be in MODE 4.	12 hours
G. [As required by Required Action E.1 and referenced in Table 3.3.11-1.	G.1 Initiate action in accordance with Specification 5.6.7. 5	Immediately]

SURVEILLANCE REQUIREMENTS

- NOTE -

These SRs apply to each PAM instrumentation Function in Table 3.3.11-1.

SURVEILLANCE		FREQUENCY
SR 3.3.11.1	Perform CHANNEL CHECK for each required instrumentation channel that is normally energized.	31 days
SR 3.3.11.2	<p>-----</p> <p>- NOTE -</p> <p>Neutron detectors are excluded from the CHANNEL CALIBRATION.</p> <p>-----</p> <p>Perform CHANNEL CALIBRATION.</p>	[18] months

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs shall be established, implemented, and maintained.

5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release Reports required by Specification [5.6.1] and Specification [5.6.2].

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 - 1. Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s) and
 - 2. A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations,
- b. Shall become effective after the approval of the plant manager, and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Occupational Radiation Exposure Report

- NOTE -

[A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.]

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in person - rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance [describe maintenance], waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescence dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totaling < 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year. [The initial report shall be submitted by April 30 of the year following the initial criticality.]

5.6.2 **1** Annual Radiological Environmental Operating Report

- NOTE -

[A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.]

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all

5.6 Reporting Requirements

5.6.1 Annual Radiological Environmental Operating Report (continued)

environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements [in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979]. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.2 Radiological Effluent Release Report

- NOTE -

[A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.]

The Radioactive Effluent Release Report covering the operation of the unit in the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

5.6.3 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

[The individual specifications that address core operating limits must be referenced here.]

5.6 Reporting Requirements

5.6.7 **3** Core Operating Limits Report (continued)

- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

[Identify the Topical Report(s) by number and title or identify the staff Safety Evaluation Report for a plant specific methodology by NRC letter and date. The COLR will contain the complete identification for each of the TS referenced topical reports used to prepare the COLR (i.e., report number, title, revision, date, and any supplements).]
- c. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling System (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met.
- d. The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

5.6.6 **4** Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)

- a. RCS pressure and temperature limits for heat up, cooldown, low temperature operation, criticality, and hydrostatic testing as well as heatup and cooldown rates shall be established and documented in the PTLR for the following:

[The individual specifications that address RCS pressure and temperature limits must be referenced here.]
- b. The analytical methods used to determine the RCS pressure and temperature limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

[Identify the NRC staff approval document by date.]
- c. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.

5.6 Reporting Requirements

5.6.6 **4** RCS Pressure and Temperature Limits Report (continued)

- REVIEWER'S NOTE -

The methodology for the calculation of the P-T limits for NRC approval should include the following provisions:

1. The methodology shall describe how the neutron fluence is calculated (reference new Regulatory Guide when issued).
 2. The Reactor Vessel Material Surveillance Program shall comply with Appendix H to 10 CFR 50. The reactor vessel material irradiation surveillance specimen removal schedule shall be provided, along with how the specimen examinations shall be used to update the PTLR curves.
 3. Low Temperature Overpressure Protection (LTOP) System lift setting limits for the Power Operated Relief Valves (PORVs), developed using NRC-approved methodologies may be included in the PTLR.
 4. The adjusted reference temperature (ART) for each reactor beltline material shall be calculated, accounting for radiation embrittlement, in accordance with Regulatory Guide 1.99, Revision 2.
 5. The limiting ART shall be incorporated into the calculation of the pressure and temperature limit curves in accordance with NUREG-0800 Standard Review Plan 5.3.2, Pressure-Temperature Limits.
 6. The minimum temperature requirements of Appendix G to 10 CFR Part 50 shall be incorporated into the pressure and temperature limit curves.
 7. Licensees who have removed two or more capsules should compare for each surveillance material the measured increase in reference temperature (RT_{NDT}) to the predicted increase in RT_{NDT} ; where the predicted increase in RT_{NDT} is based on the mean shift in RT_{NDT} plus the two standard deviation value ($2\sigma_{\Delta}$) specified in Regulatory Guide 1.99, Revision 2. If the measured value exceeds the predicted value (increase in $RT_{NDT} + 2\sigma_{\Delta}$), the licensee should provide a supplement to the PTLR to demonstrate how the results affect the approved methodology.
-

5.6.7 **5** Post Accident Monitoring Report

When a report is required by Condition B or G of LCO 3.3.[17], "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of

5.6 Reporting Requirements

5.6.8 **5** Post Accident Monitoring Report (continued)

monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

5.6.9 **6** Tendon Surveillance Report

[Any abnormal degradation of the containment structure detected during the tests required by the Pre-stressed Concrete Containment Tendon Surveillance Program shall be reported to the NRC within 30 days. The report shall include a description of the tendon condition, the condition of the concrete (especially at tendon anchorages), the inspection procedures, the tolerances on cracking, and the corrective action taken.]

5.6.9 **7** Steam Generator Tube Inspector Report

- REVIEWER'S NOTES -

1. Reports required by the Licensee's current licensing basis regarding steam generator tube surveillance requirements shall be included here. An appropriate administrative controls format should be used.
 2. These reports may be required covering inspection, test, and maintenance activities. These reports are determined on an individual basis for each unit and their preparation and submittal are designated in the Technical Specifications.
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BASES

ACTIONS

Note 1 has been added in the ACTIONS to exclude the MODE change restriction of LCO 3.0.4. This exception allows entry into the applicable MODE while relying on the ACTIONS, even though the ACTIONS may eventually require plant shutdown. This exception is acceptable due to the passive function of the instruments, the operator's ability to monitor an accident using alternate instruments and methods, and the low probability of an event requiring these instruments.

Note 2 has been added in the ACTIONS to clarify the application of Completion Time rules. The Conditions of this Specification may be entered independently for each Function listed in Table 3.3.11-1. The Completion Time(s) of the inoperable channel(s) of a Function will be tracked separately for each Function, starting from the time the Condition was entered for that Function.

A.1

When one or more Functions have one required channel that is inoperable, the required inoperable channel must be restored to OPERABLE status within 30 days. The 30 day Completion Time is based on operating experience and takes into account the remaining OPERABLE channel (or in the case of a Function that has only one required channel, other non-Regulatory Guide 1.97 instrument channels to monitor the Function), the passive nature of the instrument (no critical automatic action is assumed to occur from these instruments), and the low probability of an event requiring PAM instrumentation during this interval.

B.1

5

This Required Action specifies initiation of actions in accordance with Specification 5.6.7, which requires a written report to be submitted to the Nuclear Regulatory Commission. This report discusses the results of the root cause evaluation of the inoperability and identifies proposed restorative Required Actions. This Required Action is appropriate in lieu of a shutdown requirement, given the likelihood of plant conditions that would require information provided by this instrumentation. Also, alternative Required Actions are identified before a loss of functional capability condition occurs.

C.1

When one or more Functions have two required channels inoperable (i.e., two channels inoperable in the same Function), one channel in the Function should be restored to OPERABLE status within 7 days. The

BASES

ACTIONS (continued)

G.1

[At this plant, alternate means of monitoring Reactor Vessel Water Level and Containment Area Radiation have been developed and tested. These alternate means may be temporarily installed if the normal PAM channel cannot be restored to OPERABLE status within the allotted time. If these alternate means are used, the Required Action is not to shut down the plant, but rather to follow the directions of Specification 5.6.7. **5** The report provided to the NRC should discuss the alternate means used, describe the degree to which the alternate means are equivalent to the installed PAM channels, justify the areas in which they are not equivalent, and provide a schedule for restoring the normal PAM channels.]

SURVEILLANCE REQUIREMENTS

A Note at the beginning of the Surveillance Requirementsspecifies that the following SRs apply to each PAM instrumentation Function in Table 3.3.11-1.

SR 3.3.11.1

Performance of the CHANNEL CHECK once every 31 days ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the two instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

Agreement criteria are determined by the plant staff based on a combination of the channel instrument uncertainties, including indication and readability. If a channel is outside the criteria, it may be an indication that the sensor or the signal processing equipment has drifted outside its limit. If the channels are within the criteria, it is an indication that the channels are OPERABLE. If the channels are normally off scale during times when surveillance is required, the CHANNEL CHECK will only verify that they are off scale in the same direction. Off scale low current loop channels are verified to be reading at the bottom of the range and not failed downscale.

BASES

ACTIONS (continued)

entered independently for each Function listed in Table 3.3.11-1. The Completion Time(s) of the inoperable channel(s) of a Function will be tracked separately for each Function starting from the time the Condition was entered for that Function.

A.1

When one or more Functions have one required channel that is inoperable, the required inoperable channel must be restored to OPERABLE status within 30 days. The 30 day Completion Time is based on operating experience and takes into account the remaining OPERABLE channel (or in the case of a Function that has only one required channel, other non-Regulatory Guide 1.97 instrument channels to monitor the Function), the passive nature of the instrument (no critical automatic action is assumed to occur from these instruments), and the low probability of an event requiring PAM instrumentation during this interval.

B.1

5

This Required Action specifies initiation of actions in accordance with Specification 5.6.1, which requires a written report to be submitted to the Nuclear Regulatory Commission. This report discusses the results of the root cause evaluation of the inoperability and identifies proposed restorative Required Actions. This Required Action is appropriate in lieu of a shutdown requirement, given the likelihood of plant conditions that would require information provided by this instrumentation. Also, alternative Required Actions are identified before a loss of functional capability condition occurs.

C.1

When one or more Functions have two required channels inoperable (i.e., two channels inoperable in the same Function), one channel in the Function should be restored to OPERABLE status within 7 days. The Completion Time of 7 days is based on the relatively low probability of an event requiring PAM instrumentation operation and the availability of alternate means to obtain the required information. Continuous operation with two required channels inoperable in a Function is not acceptable because the alternate indications may not fully meet all performance qualification requirements applied to the PAM instrumentation. Therefore, requiring restoration of one inoperable channel of the Function

BASES

ACTIONS (continued)

limits the risk that the PAM Function will be in a degraded condition should an accident occur.

D.1

When two required hydrogen monitor channels are inoperable, Required Action D.1 requires one channel to be restored to OPERABLE status. This Required Action restores the monitoring capability of the hydrogen monitor. The 72 hour Completion Time is based on the relatively low probability of an event requiring hydrogen monitoring and the availability of alternative means to obtain the required information. Continuous operation with two required channels inoperable is not acceptable because alternate indications are not available.

E.1

This Required Action directs entry into the appropriate Condition referenced in Table 3.3.11-1. The applicable Condition referenced in the Table is Function dependent. Each time Required Action C.1 or D.1 is not met, and the associated Completion Time has expired, Condition E is entered for that channel and provides for transfer to the appropriate subsequent Condition.

F.1 and F.2

If the Required Action and associated Completion Time of Condition C are not met and Table 3.3.11-1 directs entry into Condition F, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 4 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

[G.1

At this plant, alternate means of monitoring Reactor Vessel Water Level and Containment Area Radiation have been developed and tested. These alternate means may be temporarily installed if the normal PAM channel cannot be restored to OPERABLE status within the allotted time. If these alternate means are used, the Required Action is not to shut down the plant, but rather to follow the directions of Specification 5.6.7. 5 The report provided to the NRC should discuss whether the alternate

1.1 Definitions

CHANNEL FUNCTIONAL TEST (continued)

CHANNEL FUNCTIONAL TEST may be performed by means of any series of sequential, overlapping, or total channel steps.

CORE ALTERATION

CORE ALTERATION shall be the movement of any fuel, sources, or reactivity control components, within the reactor vessel with the vessel head removed and fuel in the vessel. The following exceptions are not considered to be CORE ALTERATIONS:

- a. Movement of source range monitors, local power range monitors, intermediate range monitors, traversing incore probes, or special movable detectors (including undervessel replacement), and
- b. Control rod movement, provided there are no fuel assemblies in the associated core cell.

Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.

CORE OPERATING LIMITS REPORT (COLR)

The COLR is the unit specific document that provides cycle specific parameter limits for the current reload cycle. These cycle specific limits shall be determined for each reload cycle in accordance with Specification 5.6. ~~f~~. Plant operation within these limits is addressed in individual Specifications.

DOSE EQUIVALENT I-131

3
DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcuries/gram) that alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be those listed in [Table III of TID-14844, AEC, 1962, "Calculation of Distance Factors for Power and Test Reactor Sites" or those listed in Table E-7 of Regulatory Guide 1.109, Rev. 1, NRC, 1977, or ICRP 30, Supplement to Part 1, page 192-212, Table titled, "Committed Dose Equivalent in Target Organs or Tissues per Intake of Unit Activity"].

EMERGENCY CORE COOLING SYSTEM (ECCS) RESPONSE TIME

The ECCS RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its ECCS initiation setpoint at the channel sensor until the ECCS equipment is capable of performing its safety function (i.e., the valves

1.1 Definitions

MINIMUM CRITICAL POWER RATIO (MCPR)	The MCPR shall be the smallest critical power ratio (CPR) that exists in the core [for each class of fuel]. The CPR is that power in the assembly that is calculated by application of the appropriate correlation(s) to cause some point in the assembly to experience boiling transition, divided by the actual assembly operating power.
MODE	A MODE shall correspond to any one inclusive combination of mode switch position, average reactor coolant temperature, and reactor vessel head closure bolt tensioning specified in Table 1.1-1 with fuel in the reactor vessel.
OPERABLE - OPERABILITY	A system, subsystem, division, component, or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, normal or emergency electrical power, cooling and seal water, lubrication, and other auxiliary equipment that are required for the system, subsystem, division, component, or device to perform its specified safety function(s) are also capable of performing their related support function(s).
PHYSICS TESTS	<p>PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation.</p> <p>These tests are:</p> <ul style="list-style-type: none"> a. Described in Chapter [14, Initial Test Program] of the FSAR, b. Authorized under the provisions of 10 CFR 50.59, or c. Otherwise approved by the Nuclear Regulatory Commission.
PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)	The PTLR is the unit specific document that provides the reactor vessel pressure and temperature limits, including heatup and cooldown rates, for the current reactor vessel fluence period. These pressure and temperature limits shall be determined for each fluence period in accordance with Specification 5.6. 4

3.3 INSTRUMENTATION

3.3.3.1 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.3.1 The PAM instrumentation for each Function in Table 3.3.3.1-1 shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

- NOTES -

1. LCO 3.0.4 is not applicable.
2. Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one required channel inoperable.	A.1 Restore required channel to OPERABLE status.	30 days
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action in accordance with Specification 5.6.1. 5	Immediately
C. ----- - NOTE - Not applicable to [hydrogen monitor] channels. ----- One or more Functions with two required channels inoperable.	C.1 Restore one required channel to OPERABLE status.	7 days
D. Two [required hydrogen monitor] channels inoperable.	D.1 Restore one [required hydrogen monitor] channel to OPERABLE status.	72 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Required Action and associated Completion Time of Condition C or D not met.	E.1 Enter the Condition referenced in Table 3.3.3.1-1 for the channel.	Immediately
F. As required by Required Action E.1 and referenced in Table 3.3.3.1-1.	F.1 Be in MODE 3.	12 hours
G. [As required by Required Action E.1 and referenced in Table 3.3.3.1-1.	G.1 Initiate action in accordance with Specification 5.6. 5 5	Immediately]

SURVEILLANCE REQUIREMENTS

- NOTE -

These SRs apply to each Function in Table 3.3.3.1-1.

SURVEILLANCE	FREQUENCY
SR 3.3.3.1.1 Perform CHANNEL CHECK.	31 days
SR 3.3.3.1.2 Perform CHANNEL CALIBRATION.	[18] months

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs shall be established, implemented, and maintained.

5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program, and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release Reports required by Specification [5.6.2] and Specification [5.6.3].

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 1. Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s) and
 2. A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations,
- b. Shall become effective after the approval of the plant manager, and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1	<u>Occupational Radiation Exposure Report</u>
<hr/>	
<p style="text-align: center;">- NOTE -</p>	
<p>[A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.]</p>	
<hr/>	
<p>A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in person - rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance [describe maintenance], waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescence dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totaling < 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year. [The initial report shall be submitted by April 30 of the year following the initial criticality.]</p>	

5.6.2 **1** Annual Radiological Environmental Operating Report

- NOTE -

[A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.]

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all

5.6 Reporting Requirements

5.6.2 Annual Radiological Environmental Operating Report (continued)

1

environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements [in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979]. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 **2** Radiological Effluent Release Report

- NOTE -

[A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.]

The Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

5.6.3 **3** CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

[The individual specifications that address core operating limits must be referenced here.]

5.6 Reporting Requirements

5.6. ~~§~~ CORE OPERATING LIMITS REPORT (continued)

3

- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

[Identify the Topical Report(s) by number and title or identify the staff Safety Evaluation Report for a plant specific methodology by NRC letter and date. The COLR will contain the complete identification for each of the TS referenced topical reports used to prepare the COLR (i.e., report number, title, revision, date, and any supplements).]

- c. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met.
- d. The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

5.6. ~~§~~ **4** Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)

- a. RCS pressure and temperature limits for heat up, cooldown, low temperature operation, criticality, and hydrostatic testing as well as heatup and cooldown rates shall be established and documented in the PTLR for the following:

[The individual specifications that address RCS pressure and temperature limits must be referenced here.]

- b. The analytical methods used to determine the RCS pressure and temperature limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

[Identify the Topical Report(s) by number and title or identify the NRC Safety Evaluation for a plant specific methodology by NRC letter and date. The PTLR will contain the complete identification for each of the TS referenced Topical Reports used to prepare the PTLR (i.e., report number, title, revision, date, and any supplements).]

- c. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.

5.6 Reporting Requirements

5.6.6 RCS PRESSURE AND TEMPERATURE LIMITS REPORT (continued)

4

- REVIEWER'S NOTE -

The methodology for the calculation of the P-T limits for NRC approval should include the following provisions:

1. The methodology shall describe how the neutron fluence is calculated (reference new Regulatory Guide when issued).
 2. The Reactor Vessel Material Surveillance Program shall comply with Appendix H to 10 CFR 50. The reactor vessel material irradiation surveillance specimen removal schedule shall be provided, along with how the specimen examinations shall be used to update the PTLR curves.
 3. Low Temperature Overpressure Protection (LTOP) System lift setting limits for the Power Operated Relief Valves (PORVs), developed using NRC-approved methodologies may be included in the PTLR.
 4. The adjusted reference temperature (ART) for each reactor beltline material shall be calculated, accounting for radiation embrittlement, in accordance with Regulatory Guide 1.99, Revision 2.
 5. The limiting ART shall be incorporated into the calculation of the pressure and temperature limit curves in accordance with NUREG-0800 Standard Review Plan 5.3.2, Pressure-Temperature Limits.
 6. The minimum temperature requirements of Appendix G to 10 CFR Part 50 shall be incorporated into the pressure and temperature limit curves.
 7. Licensees who have removed two or more capsules should compare for each surveillance material the measured increase in reference temperature (RT_{NDT}) to the predicted increase in RT_{NDT} ; where the predicted increase in RT_{NDT} is based on the mean shift in RT_{NDT} plus the two standard deviation value ($2\sigma_{\Delta}$) specified in Regulatory Guide 1.99, Revision 2. If the measured value exceeds the predicted value (increase $RT_{NDT} + 2\sigma_{\Delta}$), the licensee should provide a supplement to the PTLR to demonstrate how the results affect the approved methodology.
-

5.6.7 **5**

Post Accident Monitoring Report

When a report is required by Condition B or G of LCO 3.3.[3.1], "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of

5.6 Reporting Requirements

5.6.7 **5** Post Accident Monitoring Report (continued)

monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

- REVIEWER'S NOTE -

These reports may be required covering inspection, test, and maintenance activities. These reports are determined on an individual basis for each unit and their preparation and submittal are designated in the Technical Specifications.

REVISION HISTORY

REVISION	TSTF	DESCRIPTION	APPROVED
2.1	TSTF-419	Revise PTLR Definition and References in ISTS 5.6.6, RCS PTLR	03/21/02

BASES

ACTIONS (continued)

an accident using alternative instruments and methods, and the low probability of an event requiring these instruments.

Note 2 has been provided to modify the ACTIONS related to PAM instrumentation channels. Section 1.3, Completion Times, specifies that once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition discovered to be inoperable or not within limits, will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for inoperable PAM instrumentation channels provide appropriate compensatory measures for separate Functions. As such, a Note has been provided that allows separate Condition entry for each inoperable PAM Function.

A.1

When one or more Functions have one required channel that is inoperable, the required inoperable channel must be restored to OPERABLE status within 30 days. The 30 day Completion Time is based on operating experience and takes into account the remaining OPERABLE channels (or, in the case of a Function that has only one required channel, other non-Regulatory Guide 1.97 instrument channels to monitor the Function), the passive nature of the instrument (no critical automatic action is assumed to occur from these instruments), and the low probability of an event requiring PAM instrumentation during this interval.

B.1

5

If a channel has not been restored to OPERABLE status in 30 days, this Required Action specifies initiation of action in accordance with Specification 5.6.7, which requires a written report to be submitted to the NRC. This report discusses the results of the root cause evaluation of the inoperability and identifies proposed restorative actions. This action is appropriate in lieu of a shutdown requirement, since alternative actions are identified before loss of functional capability, and given the likelihood of plant conditions that would require information provided by this instrumentation.

BASES

ACTIONS (continued)

associated Completion Time has expired, Condition E is entered for that channel and provides for transfer to the appropriate subsequent Condition.

F.1

For the majority of Functions in Table 3.3.3.1-1, if any Required Action and associated Completion Time of Condition C or D are not met, the plant must be brought to a MODE in which the LCO not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

G.1

Since alternate means of monitoring primary containment area radiation have been developed and tested, the Required Action is not to shut down the plant, but rather to follow the directions of Specification 5.6.7. These alternate means may be temporarily installed if the normal PAM channel cannot be restored to OPERABLE status within the allotted time. The report provided to the NRC should discuss the alternate means used, describe the degree to which the alternate means are equivalent to the installed PAM channels, justify the areas in which they are not equivalent, and provide a schedule for restoring the normal PAM channels.

5

SURVEILLANCE REQUIREMENTS

The following SRs apply to each PAM instrumentation Function in Table 3.3.3.1-1.

SR 3.3.3.1.1

Performance of the CHANNEL CHECK once every 31 days ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel against a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between instrument channels could be an indication of excessive instrument drift in one of the channels or something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each

1.1 Definitions

CHANNEL FUNCTIONAL TEST (continued)

CHANNEL FUNCTIONAL TEST may be performed by means of any series of sequential, overlapping, or total channel steps.

CORE ALTERATION

CORE ALTERATION shall be the movement of any fuel, sources, or reactivity control components, within the reactor vessel with the vessel head removed and fuel in the vessel. The following exceptions are not considered to be CORE ALTERATIONS:

- a. Movement of source range monitors, local power range monitors, intermediate range monitors, traversing incore probes, or special movable detectors (including undervessel replacement), and
- b. Control rod movement, provided there are no fuel assemblies in the associated core cell.

Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.

CORE OPERATING LIMITS REPORT (COLR)

The COLR is the unit specific document that provides cycle specific parameter limits for the current reload cycle. These cycle specific limits shall be determined for each reload cycle in accordance with Specification 5.6. ~~f~~. Plant operation within these limits is addressed in individual Specifications.

DOSE EQUIVALENT I-131

DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcuries/gram) that alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be those listed in [Table III of TID-14844, AEC, 1962, "Calculation of Distance Factors for Power and Test Reactor Sites" or those listed in Table E-7 of Regulatory Guide 1.109, Rev. 1, NRC, 1977, or ICRP 30, Supplement to Part 1, page 192-212, Table titled, "Committed Dose Equivalent in Target Organs or Tissues per Intake of Unit Activity"].

EMERGENCY CORE COOLING SYSTEM (ECCS) RESPONSE TIME

The ECCS RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its ECCS initiation setpoint at the channel sensor until the ECCS equipment is capable of performing its safety function (i.e., the valves

1.1 Definitions

MINIMUM CRITICAL POWER RATIO (MCPR)	The MCPR shall be the smallest critical power ratio (CPR) that exists in the core [for each class of fuel]. The CPR is that power in the assembly that is calculated by application of the appropriate correlation(s) to cause some point in the assembly to experience boiling transition, divided by the actual assembly operating power.
MODE	A MODE shall correspond to any one inclusive combination of mode switch position, average reactor coolant temperature, and reactor vessel head closure bolt tensioning specified in Table 1.1-1 with fuel in the reactor vessel.
OPERABLE - OPERABILITY	A system, subsystem, division, component, or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, normal or emergency electrical power, cooling and seal water, lubrication, and other auxiliary equipment that are required for the system, subsystem, division, component, or device to perform its specified safety function(s) are also capable of performing their related support function(s).
PHYSICS TESTS	<p>PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation.</p> <p>These tests are:</p> <ul style="list-style-type: none">a. Described in Chapter [14, Initial Test Program] of the FSAR,b. Authorized under the provisions of 10 CFR 50.59, orc. Otherwise approved by the Nuclear Regulatory Commission.
PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)	The PTLR is the unit specific document that provides the reactor vessel pressure and temperature limits, including heatup and cooldown rates, for the current reactor vessel fluence period. These pressure and temperature limits shall be determined for each fluence period in accordance with Specification 5.6. 4 4

3.3 INSTRUMENTATION

3.3.3.1 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.3.1 The PAM instrumentation for each Function in Table 3.3.3.1-1 shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

- NOTES -

1. LCO 3.0.4 is not applicable.
2. Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one required channel inoperable.	A.1 Restore required channel to OPERABLE status.	30 days
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action in accordance with Specification 5.6.7. 5	Immediately
C. ----- - NOTE - Not applicable to [hydrogen monitor] channels. ----- One or more Functions with two required channels inoperable.	C.1 Restore one required channel to OPERABLE status.	7 days
D. Two [required hydrogen monitor] channels inoperable.	D.1 Restore one [required hydrogen monitor] channel to OPERABLE status.	72 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Required Action and associated Completion Time of Condition C or D not met.	E.1 Enter the Condition referenced in Table 3.3.3.1-1 for the channel.	Immediately
F. As required by Required Action E.1 and referenced in Table 3.3.3.1-1.	F.1 Be in MODE 3.	12 hours
G. [As required by Required Action E.1 and referenced in Table 3.3.3.1-1.	G.1 Initiate action in accordance with Specification 5.6.7. 5	Immediately]

SURVEILLANCE REQUIREMENTS

- NOTE -

These SRs apply to each Function in Table 3.3.3.1-1.

SURVEILLANCE	FREQUENCY
SR 3.3.3.1.1 Perform CHANNEL CHECK.	31 days
SR 3.3.3.1.2 Perform CHANNEL CALIBRATION.	[18] months

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs shall be established, implemented, and maintained.

5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program, and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities and descriptions of the information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release Reports required by Specification [5.6.1] and Specification [5.6.2].

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 1. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s) and
 2. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations,
- b. Shall become effective after approval of the plant manager, and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of, or concurrent with, the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Occupational Radiation Exposure Report

- NOTE -

[A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.]

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in person - rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance [describe maintenance], waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescence dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totaling < 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year. [The initial report shall be submitted by April 30 of the year following the initial criticality.]

5.6.2 1 Annual Radiological Environmental Operating Report

- NOTE -

[A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.]

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all

5.6 Reporting Requirements

5.6.7 Annual Radiological Environmental Operating Report (continued)

1

environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements [in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979]. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.8 **2** Radioactive Effluent Release Report

- NOTE -

[A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.]

The Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

5.6.9 **3** CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

[The individual specifications that address core operating limits must be referenced here.]

5.6 Reporting Requirements

5.6.5 CORE OPERATING LIMITS REPORT (continued)

3

- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

[Identify the Topical Report(s) by number and title or identify the staff Safety Evaluation Report for a plant specific methodology by NRC letter and date. The COLR will contain the complete identification for each of the TS referenced topical reports used to prepare the COLR (i.e., report number, title, revision, date, and any supplements).]

- c. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met.
- d. The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

5.6.6 **4**

Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)

- a. RCS pressure and temperature limits for heatup, cooldown, low temperature operation, criticality, and hydrostatic testing as well as heatup and cooldown rates shall be established and documented in the PTLR for the following:

[The individual specifications that address RCS pressure and temperature limits must be referenced here.]

- b. The analytical methods used to determine the RCS pressure and temperature limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

[Identify the Topical Report(s) by number and title or identify the NRC Safety Evaluation for a plant specific methodology by NRC letter and date. The PTLR will contain the complete identification for each of the TS referenced Topical Reports used to prepare the PTLR (i.e., report number, title, revision, date, and any supplements).]

- c. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.

5.6 Reporting Requirements

5.6.1 RCS PRESSURE AND TEMPERATURE LIMITS REPORT (continued)

4

- REVIEWER'S NOTE -

The methodology for the calculation of the P-T limits for NRC approval should include the following provisions:

1. The methodology shall describe how the neutron fluence is calculated (reference new Regulatory Guide when issued).
2. The Reactor Vessel Material Surveillance Program shall comply with Appendix H to 10 CFR 50. The reactor vessel material irradiation surveillance specimen removal schedule shall be provided, along with how the specimen examinations shall be used to update the PTLR curves.
3. Low Temperature Overpressure Protection (LTOP) System lift setting limits for the Power Operated Relief Valves (PORVs), developed using NRC-approved methodologies may be included in the PTLR.
4. The adjusted reference temperature (ART) for each reactor beltline material shall be calculated, accounting for radiation embrittlement, in accordance with Regulatory Guide 1.99, Revision 2.
5. The limiting ART shall be incorporated into the calculation of the pressure and temperature limit curves in accordance with NUREG-0800 Standard Review Plan 5.3.2, Pressure-Temperature Limits.
6. The minimum temperature requirements of Appendix G to 10 CFR Part 50 shall be incorporated into the pressure and temperature limit curves.
7. Licensees who have removed two or more capsules should compare for each surveillance material the measured increase in reference temperature (RT_{NDT}) to the predicted increase in RT_{NDT} ; where the predicted increase in RT_{NDT} is based on the mean shift in RT_{NDT} plus the two standard deviation value ($2\sigma_{\Delta}$) specified in Regulatory Guide 1.99, Revision 2. If the measured value exceeds the predicted value (increase in $RT_{NDT} + 2\sigma_{\Delta}$), the licensee should provide a supplement to the PTLR to demonstrate how the results affect the approved methodology.

5.6.2 **5**

Post Accident Monitoring Report

When a Special Report is required by Condition B or G of LCO 3.3.[3.1], "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method

5.6 Reporting Requirements

5.6. ~~5~~ **5** Post Accident Monitoring Report (continued)

of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

5.6. ~~6~~ **6** [Tendon Surveillance Report

Any abnormal degradation of the containment structure detected during the tests required by the Pre-Stressed Concrete Containment Tendon Surveillance Program shall be reported to the NRC within 30 days. The report shall include a description of the tendon condition, the condition of the concrete (especially at tendon anchorages), the inspection procedures, the tolerances on cracking, and the corrective action taken.]

- REVIEWER'S NOTES -

These reports may be required covering inspection, test, and maintenance activities. These reports are determined on an individual basis for each unit and their preparation and submittal are designated in the Technical Specifications.

REVISION HISTORY

REVISION	TSTF	DESCRIPTION	APPROVED
2.1	TSTF-419	Revise PTLR Definition and References in ISTS 5.6.6, RCS PTLR	03/21/02

BASES

ACTIONS

Note 1 has been added to the ACTIONS to exclude the MODE change restriction of LCO 3.0.4. This exception allows entry into the applicable MODE while relying on the Actions even though the Actions may eventually require plant shutdown. This exception is acceptable due to the passive function of the instruments, the operator's ability to diagnose an accident using alternate instruments and methods, and the low probability of an event requiring these instruments.

A Note has also been provided to modify the ACTIONS related to PAM instrumentation channels. Section 1.3, Completion Times, specifies that once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for inoperable PAM instrumentation channels provide appropriate compensatory measures for separate inoperable functions. As such, a Note has been provided that allows separate Condition entry for each inoperable PAM Function.

A.1

When one or more Functions have one required channel that is inoperable, the required inoperable channel must be restored to OPERABLE status within 30 days. The 30 day Completion Time is based on operating experience and takes into account the remaining OPERABLE channel (or in the case of a Function that has only one required channel, other non-Regulatory Guide 1.97 instrument channels to monitor the Function), the passive nature of the instrument (no critical automatic action is assumed to occur from these instruments), and the low probability of an event requiring PAM instrumentation during this interval.

B.1

5

If a channel has not been restored to OPERABLE status in 30 days, this Required Action specifies initiation of actions in accordance with Specification 5.6.7, which requires a written report to be submitted to the NRC. This report discusses the results of the root cause evaluation of the inoperability and identifies proposed restorative actions. This Action is appropriate in lieu of a shutdown requirement since alternative Actions are identified before loss of functional capability, and given the likelihood of plant conditions that would require information provided by this instrumentation.

BASES

ACTIONS (continued)

channel and provides for transfer to the appropriate subsequent Condition.

F.1

For the majority of Functions in Table 3.3.3.1-1, if any Required Action and associated Completion Time of Condition C or D is not met, the plant must be placed in a MODE in which the LCO does not apply. This is done by placing the plant in at least MODE 3 within 12 hours.

The allowed Completion Times are reasonable, based on operating experience, to reach the required plant condition from full power conditions in an orderly manner and without challenging plant systems.

G.1

Since alternate means of monitoring primary containment area radiation have been developed and tested, the Required Action is not to shut down the plant but rather to follow the directions of Specification 5.6~~7~~. These 5 alternate means may be temporarily installed if the normal PAM channel cannot be restored to OPERABLE status within the allotted time. The report provided to the NRC should discuss the alternate means used, describe the degree to which the alternate means are equivalent to the installed PAM channels, justify the areas in which they are not equivalent, and provide a schedule for restoring the normal PAM channels.

SURVEILLANCE REQUIREMENTS

The following SRs apply to each PAM instrumentation Function in Table 3.3.3.1-1.

SR 3.3.3.1.1

Performance of the CHANNEL CHECK once every 31 days ensures that a gross instrumentation failure has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION. The high radiation instrumentation should be compared to similar plant instruments located throughout the plant.
